



**CONESTOGA-ROVERS
& ASSOCIATES**

DRWM Rec'd JG 29 2011

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August 26, 2011

file

Reference No. 054046

Mr. David Garrett
U.S. Environmental Protection Agency, Region 7
Air and Waste Management Division
RCRA Corrective Action & Permits Branch
901 N. Fifth Street
Kansas City, Kansas 66101

VIA FEDEX COURIER

Dear Mr. Garrett:

Re: Response to U.S. EPA's Comments
Conceptual Design Summary Groundwater Interim Corrective Measures Modification
Occidental Chemical Corporation
6200 S. Ridge Road, Wichita, Kansas
RCRA ID# KSD007482029

Conestoga-Rovers & Associates (CRA), on behalf of Occidental Chemical Corporation (OCC), has prepared responses to the United States Environmental Protection Agency (U.S. EPA) comments detailed in your letter dated August 1, 2011. For ease of your review, U.S. EPA's comments are reiterated below in italic print, followed by CRA's response. In addition, two revised full copies of the report are attached hereto.

Specific Comments

1. *Response to EPA Specific Comment 2 on Section 3.1, Supplemental Interceptor Well Overview. The response included information regarding a preliminary hydraulic evaluation, but no change was made to the Conceptual Design Summary. The Conceptual Design Summary must be revised to include a reference or attachment detailing the nature and extent of the groundwater contaminant plume, with information supporting the proposed interceptor well configuration and pumping rates.*

Response

Section 3.1 of the report has been revised to include the additional details provided within the June 17, 2011 response to comments letter.

2. *Response to EPA Specific Comment 3 on Section 3.1, Supplemental Interceptor Well Overview. The response expressed agreement with EPA's comment, but no change was made to the Conceptual Design Summary. The Conceptual Design Summary must be revised to discuss capacities and permit requirements of the deep well injection system and associated piping.*



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August 26, 2011

2

Reference No. 054046

Response

In response to EPA's Specific Comment No. 3 on Section 3.1, revisions were instead made to Section 3.2 in the June 2011 revised report. The response inadvertently did not specify which section was revised in the June 17, 2011 response to comments letter.

3. *Response to EPA Specific Comment 4 on Section 3.1, Supplemental Interceptor Well Overview. The response expressed agreement with EPA's comment, but no change was made to the Conceptual Design Summary. The Conceptual Design Summary must be revised to discuss failsafe provisions and major alarms, including, at a minimum:*

- *Type of alarm notification planned,*
- *Major alarm conditions and how they are triggered, and*
- *System response in the event communication fails between a well and the Programmable Logic Controller.*

Response

Revisions in response to EPA's Specific Comment No. 4 on Section 3.1 were completed instead to Section 3.3 of the revised June 2011 report.

4. *Response to EPA Specific Comment 5 on Section 4.0, Potential Future Treatment System. The response included information regarding target groundwater contaminants, but no change was made to the Conceptual Design Summary. The Conceptual Design Summary must be revised to discuss target groundwater contaminants so that the basis for the proposed treatment options can be clearly understood.*

Response

Agreed. Section 4.0 has been revised to include the contaminants and concentrations utilized for the initial evaluation of treatment options for the modified groundwater extraction system. As noted within the June 17, 2011 response to comments letter and the June 2011 revised report, further development and evaluation of treatment system options will be based on groundwater analytical results obtained from IW43 and IW44 after a steady-state condition is achieved at these locations.



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August 26, 2011

3

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Should you have any questions on the above, please do not hesitate to contact us.

Yours truly,

CONESTOGA-ROVERS & ASSOCIATES

Bruce Clegg

BCC/lg/52
Attachments

cc: Juan Somoano - GSHI
Lisa Blair - OCC
Jessica Kidwell - TetraTech